

Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

(For all sources except PSD and true minor sources)

Completed by: Jill Bertelson, Permit Reviewer

GENERAL INFORMATION:

Name:	Progress Rail Services Corporation
Address:	8587 Railroad Drive, Covington, KY 41015-0399
Date application received:	December 13, 1996
SIC/Source description:	4789
AFS(10-digit) Plant ID:	21-117-00154
EIS #:	079-2020-0154
Application log number:	E860
Permit number:	V-98-038

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input checked="" type="checkbox"/> Other: Promulgated CTG RACT

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☒ Area is non-attainment (list pollutants): Ozone (moderate)

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM	71.6	71.6
SO ₂	0	0
NO _x	6	6
CO	0.8	0.8
VOC	180	630.3
LEAD	0.04	0.04
HAP \geq 10 tpy (by CAS)		
78-93-3 MEK	127.1	127.1
100-41-4 Ethyl benzene	16.1	16.1
108-10-1 MIBK	35.8	35.8
108-88-3 Toluene	129.6	129.6
111-76-2 Butyl Cellosolve	61.0	61.0
569-01-3 Xylene	126.7	126.7
91-20-3 Napthalene	12.5	12.5

SOURCE PROCESS DESCRIPTION:

The existing shop houses a railcar repainting process consisting of a grit blast booth, spray painting booth with direct heating for the winter months, drying room with indirect heaters, and a stencil room with painting and indirect heaters. Railcars are blasted with steel grit or coal slag to remove the existing paint in the blast booth. Airless spray guns with low-VOC coatings are used in the spray paint booth. A bucket parts washer is used to periodically clean the spray guns. All of the heaters use propane as fuel.

The new shop consists of one room housing railcar repair operations consisting of welding, air arc gouging, oxygen cutting, grinding, caulking, fiberglass work, and painting. There are also parts washers, propane-fired space heaters, and fuel tanks associated with the New Shop.

All waste is picked up by a private waste services company and all waste solvent is picked up by the parts washers and solvent manufacturer.

EMISSION AND OPERATING CAPS DESCRIPTION:

There is a synthetic minor limit of 90 TPY on VOC emissions from the first construction project, which consists of the Spray Paint Booth painting and direct heater, Drying Room indirect heat exchangers, Stencil Room painting and indirect heat exchangers, and regulated parts washer. The permit limit covering both painting operations is adjusted for the maximum VOC emissions from the heaters and parts washer. This precludes applicability of 401 KAR 51:052.

There is a synthetic minor limit of 90 TPY on VOC emissions from the second construction project, which consists of the New Shop painting and insignificant activities. The permit limit covering the painting operation is adjusted for the maximum VOC emissions from the insignificant activities. This precludes applicability of 401 KAR 51:052.

OPERATIONAL FLEXIBILITY:

Spray Paint Booth, Stencil Room painting, New Shop painting: can use any paint system with <3.5 lb VOC/gal. The VOC content of a paint system is as-applied including thinners and solvents added. The permittee can use any clean-up solvent as long as the synthetic minor limits are not violated.